

EXHIBIT A
TO AFFIDAVIT OF
DANNY DONOHUE

5. One of the medications that I take is a steroid. The steroid affects my vision and has caused me to need a new eye glass prescription more than twice per year. New lenses in my glasses are not covered by my insurance as often as I need a new prescription. A prescription for new lenses costs more than \$100.00 each time I need them. A twenty percent reduction in my

income would greatly affect my ability to continue to maintain my eyesight so that I can properly function in my daily life.

6. I also have bacteria in my lungs that requires me to go to my doctor and obtain a prescription for anti-biotics to treat persistent, anti-biotic resistant bacteria that has grown in my lungs. Every time I go to the doctor I must pay a co-payment for the doctor visit and I must pay a co-payment for the prescription medication.

7. Having my salary reduced by twenty percent, a loss of more than \$250.00 per paycheck will cause me to have to choose between being able to take my medication on a daily basis as prescribed or paying for other basic necessities of life.


ARLENE BALABAN

Sworn to before me this
6th day of MAY, 2010


NOTARY PUBLIC - STATE OF NEW YORK

PL: 10-0645/TC/ew/Affidavit Balaban#144946

MARIA SOTOLONGO
NOTARY PUBLIC, State of New York
No. 02SO5051313
Qualified in Nassau County
My Commission Expires: 4/29/14

EXHIBIT B
TO AFFIDAVIT OF
DANNY DONOHUE

AFFIDAVIT

STATE OF NEW YORK)
)ss.:
COUNTY OF ALBANY)

NANNETTE E. CHERNEY, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO, Local 660 Office of General Services (hereinafter "CSEA").

2. I earn a net salary of \$1,042.87 biweekly.

3. I have been employed by New York State Office of General Services as a KBS I, SG6, since 1974. I currently work in the Finance Department.

4. I would be irreparably harmed by any furlough or any diminution of my pay.

5. I suffer from diabetes and require maintenance drugs in order to stay healthy. Detrol and Plavix cost \$40.00 each and I need these every three months.

6. I have a husband with two (2) types of Cancer: cancer of the tongue and prostate cancer.

7. My husband relies on chemotherapy for his continued survival. Fortunately, most of this cost is covered by our insurance, but we still must pay at least \$100.00 per month in co-payments for our medical care.

8. My husband's cancer must be treated every three months with the chemotherapy drug Lupron, [which would retail for more than \$3,000.00 without our insurance]. We pay a \$15.00 copayment for Lupron. Another cancer medication, Casodex is available generically for \$15.00 per month. A third medication he uses monthly is \$20.00.

9. We have custody of three grandchildren, ages 10, 8, and 7. We receive no child support.

Notarized before me
this 11th day of May, 2010
at Albany, New York
I, _____, Notary Public
for the State of New York
do hereby certify that
the foregoing is a true and
correct copy of the
original as shown to me.

10. I am stretched to the limit just to pay my monthly rent. In fact, I have asked the landlord to work with me and take payments every two weeks, but he is unwilling to accept bi-weekly payments.

11. I was counting on my raise to offset some of these expenses. Instead the Governor has announced that he intends to force me to take an as yet indefinite number of days off without pay—until the Legislature passes a budget.

12. As a KBS I for OGS, I can do *my* job.

13. I cannot force the Legislature or the Governor to do their jobs.

14. I cannot afford to give up any of my pay.

15. I believe that I am being irreparably harmed by the furlough and the State's failure to pay the agreed upon salary increase.

16. The harm to me is more than financial, as it forces me to choose between paying my rent, necessary medical expenses or support my family.

17. This is having a profound, detrimental impact on my husband's continued survival and is devastating to our well being.

Nannette E. Cherney

Nannette E. Cherney

Sworn to before me this

7 day of May, 2010

Monisha Richardson
NOTARY PUBLIC - STATE OF NEW YORK

FL/10-0645/TC/ab/Affidavit #144669

Monisha Richardson
Notary Public, State of New York
Qualified in Albany County
No. 01R18206242
Commission Expires May 18, 2013

EXHIBIT C
TO AFFIDAVIT OF
DANNY DONOHUE

AFFIDAVIT

STATE OF NEW YORK)
)ss.:
COUNTY OF SCHENECTADY)

SUSAN FRANCE, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO (hereinafter "CSEA").
2. I have worked for the New York State Capital District DDSO for thirty-three years and currently hold the title of Keyboard Specialist, Grade 6.
3. I currently take home approximately \$921.00 every two weeks.
4. I live with my husband and my nineteen year old son and seventeen year old daughter.
5. My husband also works for New York State and is a member of a labor union. My husband currently takes home approximately \$1,800.00 every two weeks.
6. My nineteen year old son is attending Sage College and is finishing his sophomore year, with two years remaining. His financial aid package requires an annual family contribution of \$7,000.00 per year.
7. My daughter will be graduating from high school this year and will be attending Hudson Valley Community College. We will also be helping our daughter so that she can attend college.

8. We currently have a \$250.00 home equity loan and a \$230.00 car payment. We also have a monthly car insurance payment of \$340.00. We of course have to maintain our house, cars, and provide for ourselves and our children.

9. Since both my husband and I work for New York State and are members of different labor unions, the furlough would reduce our total household income by twenty percent, resulting in a loss of earnings of about \$1,090 per month. This would severely impact our ability to pay our bills and help our children with their education.

Susan France
SUSAN FRANCE

Sworn to before me this

6 day of May, 2010.

Paul R. Benac

NOTARY PUBLIC - STATE OF NEW YORK

PAUL R. BENAC
Notary Public, State of New York
No. 01BE6213562
Qualified in Albany County
Commission Expires November 9, 2013

PL/10-0645/TC/cew/Affidavit France#145155

EXHIBIT D
TO AFFIDAVIT OF
DANNY DONOHUE

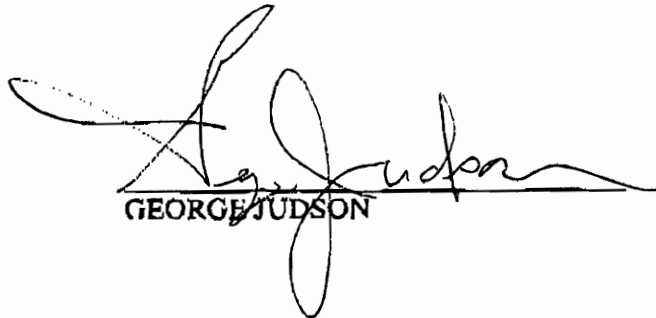
CLASSIFICATION: CONFIDENTIAL

STATE OF NEW YORK)
)ss.:
COUNTY OF CAYUGA)

GEORGE JUDSON, being duly sworn, deposes and says:

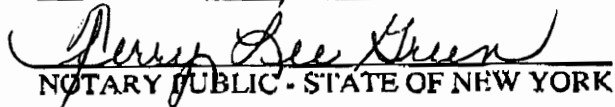
1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO (hereinafter "CSEA").
2. I have worked for the New York State Department of Transportation for twenty-seven years and my current title is a Highway Maintenance Worker, Grade 8.
3. As an employee at the Department of Transportation, my take home pay is approximately \$500.00 per week and I have no other source of income.
4. My health has taken a recent turn for the worse and I need an oxygen tank in order to breathe. While I am pursuing a disability retirement, I am currently being paid using accruals that I have earned during my twenty-seven year career with the State.
5. I have multiple doctors' appointments per month and am responsible to pay the co-payments for each doctor visit.
6. I also have blood pressure issues and currently take three different medications on a daily basis. My co-payment for these medications is \$30.00.
7. My mortgage is \$619.00 per month and my car payment is \$416.00 per month. I also am solely responsible to pay the utility bills for my home, water bill, any repairs and general maintenance for my home, as well as food, clothing and other basic necessities.

8. Having my income reduced by twenty percent, a loss of approximately \$400.00 per month, would greatly impact my ability to pay my bills for the basic necessities of life.



GEORGE JUDSON

Sworn to before me this
7th day of May, 2010.



NOTARY PUBLIC - STATE OF NEW YORK

PL/10-0645/TC/new/ALjudson#145003

TERRY LEE GREEN
Notary Public, State of New York
Cayuga County, No. 2061
My Commission Expires Mar. 23, 2011

EXHIBIT E
TO AFFIDAVIT OF
DANNY DONOHUE

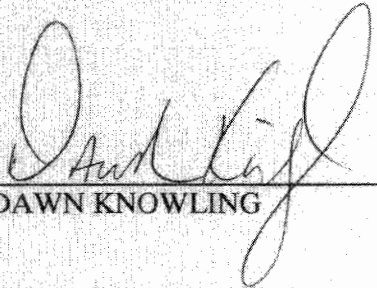
AFFIDAVIT

STATE OF NEW YORK)
)ss.:
COUNTY OF SCHENECTADY)


DAWN KNOWLING, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO.
2. I have worked for New York State Capital District DDSO for eight years and currently hold the title of Clerk I, Grade 6. I currently take home \$791.00 every two weeks as a Grade 6 and receive an additional \$180.00 every two weeks from Workers' Compensation. I have no other source of income.
3. I rent an apartment in Troy, New York and my monthly rent is \$700.00 and does not include any utilities. I also have a \$350.00 car payment and \$96.00 car insurance payment every month. In addition, I must rely solely upon myself to provide the basic necessities such as food, clothing, etc.
4. I suffer from a heart condition, high blood pressure and asthma. I have daily prescriptions that I must take for all of those ailments. My co-payments for those prescriptions are approximately \$60.00 per month. I additionally take over-the-counter medications, such as aspirin, for my medical conditions.
5. I am also under the regular care of supervision of a doctor for my medical conditions and must pay the \$15.00 co-payment each time I see my doctor(s).

6. I currently live paycheck to paycheck and losing twenty-percent of my salary, approximately \$160.00 per paycheck, would put me in a position of having to choose between my medication and other basic necessities.


DAWN KNOWLING

Sworn to before me this
6 day of May, 2010.


NOTARY PUBLIC - STATE OF NEW YORK

PL/10-0645/TC/cew/Affidavit Knowling #145086

MATTHEW J. ARSENAULT
Notary Public, State of New York
No. 01AR6025539
Qualified in Franklin County
Commission Expires June 01, 2011

EXHIBIT F
TO AFFIDAVIT OF
DANNY DONOHUE

AFFIDAVIT

STATE OF NEW YORK)
)ss.:
COUNTY OF SCHENECTADY)

SHELBY POWERS, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC.,
LOCAL 1000, AFSCME, AFL-CIO

2. I have worked for New York State for fifteen years and have worked for New York
State Capital District DDSO for 3 years. I currently hold the title of Secretary I.

3. I currently take home \$1,143.00 every two weeks.

4. I live with my boyfriend Korell and his five-year old daughter Ameera. Korell was
laid off two months ago and has not been able to find employment elsewhere. He currently
receives \$270.00 per week in unemployment benefits, which is less than he previously earned.

5. We have already had to take Ameera out of daycare since we can no longer afford to
pay for it. We are currently relying upon family and friends to babysit when Korell goes on job
interviews.

6. Our apartment is \$750.00 per month and we are responsible to pay all of the utility
bills. We are currently in arrears in paying our utility bill and are in jeopardy of having our electric
turned off. In addition, we have a car payment of \$270.00 per month and an insurance payment of
\$180.00 per month.

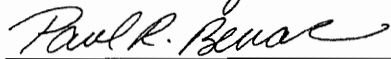
7. I also suffer from Crones disease, which requires that I take three prescription
medications daily. The monthly co-payments for the prescription medications are \$40.00.

8. I am also under the care and supervision of a doctor that I see on a monthly basis. I am also responsible to pay the co-payment for each doctor visit.

9. We live paycheck to paycheck and having my income reduced by twenty percent, approximately \$460.00 per month, is more than we will be able to handle. The cost of basic necessities keeps increasing. We do not live extravagantly and have already been cutting back wherever we can.


SHELBY POWERS

Sworn to before me this
6 day of May, 2010.



NOTARY PUBLIC - STATE OF NEW YORK

PAUL R. BENAC
Notary Public, State of New York
No. 01BE6213562
Qualified in Albany County
Commission Expires November 9, 2013

EXHIBIT G
TO AFFIDAVIT OF
DANNY DONOHUE

STATE OF NEW YORK)
)ss.:
COUNTY OF ULSTER)

AFFIDAVIT

STACY RINE, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO (hereinafter "CSEA"). Specifically, I belong to Local 610, State University College at New Paltz.

2. I am employed as a Calculations Clerk 2, salary grade 9. I earn a net biweekly salary of \$799.12. I have no other employment or source of income.

3. I submit this affidavit in support of CSEA's request for an injunction.

4. On April 13, 2010, my husband was diagnosed with stage 3 lung cancer.

5. As a result of his illness, he is completely unable to work.

6. The doctors treating him in Kingston have given him a 20% chance of survival.

7. We are seeking consultation at Sloan-Kettering in New York in hopes that there may be some treatment available to extend his life.

8. As of now, I am the sole financial support for our family. I am the one who carries the health insurance for the family.

9. My husband and I have two small children with medical issues. My eight year old has been diagnosed with ADHD and must be on a continuing course of medication and medical monitoring.

10. My two year old had open heart surgery for a congenital heart abnormality in November 2008.

11. Losing one fifth of my pay for an undetermined number of weeks would devastate us financially, given our already precarious financial situation.

12. When CSEA and the State agreed to a series of raises that were to be less for the first years of the parties' agreement, it was with the understanding that in a future year—this year—we would receive a larger raise. That was the deal for which we bargained.

13. I was counting on that raise to meet my ever-increasing expenses. Without the increased income, I don't know how we will maintain the payments on our home or meet our household expenses and uncovered medical expenses.

14. I believe that the Governor should be enjoined from violating our contract in any way or even threatening to violate our contract. I am being irreparably harmed by his actions and his threats and the harm to me is more than financial, as it is having a direct impact on my husband's struggle to survive.


Stacy Rine

Sworn to before me this

~~10th~~ day of May, 2010


NOTARY PUBLIC - STATE OF NEW YORK

PL/10-0645/TC/crb/Affidavit #144339

MICHELE C. HALSTEAD
Notary Public, State of New York
No. 4923117
Qualified in Ulster County 2014
Commission Expires March 14, 2014

EXHIBIT H
TO AFFIDAVIT OF
DANNY DONOHUE

AFFIDAVIT

STATE OF NEW YORK)
)ss.:
COUNTY OF SARATOGA)

JOHN E. SWIERS, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO, Local 0407 Capital District DDSO (hereinafter "CSEA"). I am employed as a Clerk I, SG 6, §55-b for Capital District DDSO.
2. I have been employed there for twenty-three years. My biweekly take home pay is \$731.38.
3. I submit this affidavit in support of CSEA's request for an injunction.
4. As a Salary Grade 6 Clerk, even in the best of times, I have very little money left over after I pay all of my expenses each month.
5. In the twenty-three years that I have worked for the State, I have spent some time homeless and I know what that is like.
6. I also know that I am usually one paycheck away from being homeless again.
7. My §55-b status is based on my mental disability, which requires me to be medicated and monitored continuously by a psychiatrist.
8. My medications include Prozac, Zyprexa, Valium, Oxycontin, Spiriva, Invega and Tryleptal. My medication costs (co-payments per month) total \$80.00 with insurance. If I lost my health insurance, my medication costs would presently exceed \$3525.00.
9. At present, given expenses that out-pace my income, I have had to cut back.

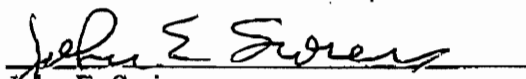
10. I am living so frugally now that I must frequently choose between rent, prescription medications and food.

11. I have elected to retain my home and my mental health. In the past several months, I have lost almost sixty pounds—and I didn't start out overweight.

12. I am six feet tall and started out weighing approximately 220 lbs. I now weigh about 164 lbs.

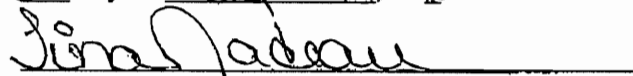
13. In addition to the wage freeze, the proposed furlough will cut my pay by 20% per week for up to eight weeks.

14. The furlough will cause me incalculable harm as I have no other place left to trim expenses. It impairs my continued ability to have a place to live, which is devastating to my physical and emotional well being.


John E. Swiers

Sworn to before me this

07 day of May, 2010


NOTARY PUBLIC - STATE OF NEW YORK

PL/10-0645/TC/erb/Affidavit #144739

TINA NADEAU
Notary Public, State of New York
Reg. No. 01NA6084203
Qualified in Saratoga County
My Commission Expires December 2, 2010

EXHIBIT I
TO AFFIDAVIT OF
DANNY DONOHUE

STATE OF NEW YORK)
)ss.:
COUNTY OF DELAWARE)

AFFIDAVIT

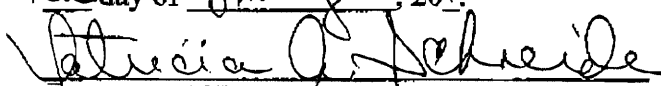
LISA THOMPSON, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO (hereinafter "CSEA").
2. I am employed as a Janitor, State Salary Grade 7, State University of New York at Delhi.
3. At the University, my take home pay is \$797.00 every two weeks. I have no other job.
4. For Eleven months, my husbands hours were cut at his job in the private sector. As a result for not working his normal hours, we lost \$500.00 per week.
5. Since then, we have relied on my pay to supply our basic needs. We have undergone continuing counseling at Consumer Credit Counseling Services. We have been striving to avoid bankruptcy, and my job has provided barely enough for us to manage on.
6. My husband returned to work in January, 2010, but his company has announced that there are going to be layoffs again.
7. I am the one who carries the health insurance for both of us at a cost of \$102.00 every two weeks.
8. We both require maintenance on pain medications; I am asthmatic and have COPD. I had to have a total hysterectomy for endometriosis and fibroid cysts and I need to be medicated with an estrogen patch. I am also on Xanax.

9. My husband has a spinal malformation that causes him severe pain and five compressed discs. He must take Oxycontin. He also uses Protonix for gastric reflux. Our total co-payments for these medications are currently over \$200.00.

10. Having my salary reduced by one hundred and sixty dollars every two weeks will cause my family to be unable to pay for our medications and our mortgage.


Lisa Thompson

Sworn to before me this
7th day of May, 2010

NOTARY PUBLIC STATE OF NEW YORK

PL/10-0645/TC/erb/Affidavit #144413

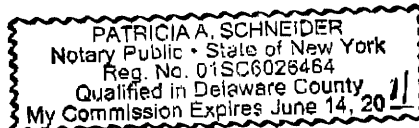


EXHIBIT J
TO AFFIDAVIT OF
DANNY DONOHUE

AFFIDAVIT

**STATE OF NEW YORK)
)ss.:
COUNTY OF WESTCHESTER)**

JOSEPH A. VISCONTI, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO (hereinafter "CSEA").
2. I have worked for the NYS Department of Transportation for twenty-five years and currently hold the position of General Foreman. My take home pay is approximately \$2,900.00 per month. I also work a part-time job at Home Depot earning approximately another \$720.00 per month. My family has no other sources of income.
3. I am married and solely support my wife who is an immigrant to this country. My wife currently cannot hold gainful employment in the United States, although she is currently going through the process so that she also has the ability to work.
4. I have a twenty year old daughter from a previous marriage that is currently in college. I help my daughter with her college expenses. In addition, I pay \$600.00 per month for child support for my daughter.
5. I own a condo in Montrose, New York and my mortgage payment is \$1,200.00 per month. I also pay a fee for common charges in the amount of \$478.00 per month and an insurance payment of \$226.00 per month.

6. Of course, I also need to provide the basic necessities for my wife and me, which is becoming increasingly difficult. As of now even with working two jobs I live paycheck to paycheck and am just barely making it.

7. A reduction in my pay of twenty percent, which would be more than \$700.00 per month, would have a catastrophic effect on me and my family. I do not see how I would be able to pay my mortgage and common charges, which would force me into foreclosure and put me and my wife out on the street.



JOSEPH A. VISCONTI

Sworn to before me this
7 day of May, 2010



NOTARY PUBLIC - STATE OF NEW YORK

FL/10-0645/TC/eev/Affidavit Visconti# 100
GIOVANNI GRANDE
Notary Public - State of New York
ID No. 01GR6138819
Qualified in Westchester County
My Commission Expires December 27, 2013

EXHIBIT K
TO AFFIDAVIT OF
DANNY DONOHUE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

**DANNY DONOHUE, Individually and as President
of the CIVIL SERVICE EMPLOYEES
ASSOCIATION, INC., LOCAL 1000, AFSCME,
AFL-CIO,**

AFFIDAVIT

Plaintiffs,

-against-

**DAVID A. PATERSON, as Governor of the State of
New York,**

Defendant,

**NEW YORK STATE ASSEMBLY and
NEW YORK STATE SENATE, and JONATHAN
LIPPMANN, Chief Judge of the New York Unified
Court System,**

Necessary Defendants.

**STATE OF NEW YORK)
)ss.:
COUNTY OF SUFFOLK)**

Elizabeth Bader, being duly sworn, deposes and says:

1. I am a member of the CIVIL SERVICE EMPLOYEES ASSOCIATION, INC., LOCAL 1000, AFSCME, AFL-CIO (hereinafter "CSEA"). Specifically, I belong to Local 0016, Long Island State Employees, Division of State Police. I have been employed by New York State for more than 32 years and the Division of State Police for 29 years. I am fully familiar with the facts and circumstances herein.

2. I submit this affidavit in support of CSEA's request for an injunction enjoining and restraining Governor Paterson from failing to pay contractual obligations as set forth in their collective bargaining agreements with CSEA.

3. I am 55 years old. I have been diagnosed with multiple myeloma, a blood cancer that has caused me to be hospitalized four times last year alone.

4. The course of chemotherapy medication necessary to keep my cancer in check and keep me alive has in the past exceeded seven thousand dollars per month, however, with my insurance I only pay a co-payment of \$15 or \$30. If I am laid off or if my hours are reduced, I believe that I could lose my insurance benefits. This would be catastrophic for me.

5. Presently, I must undergo a bone-marrow transplant to improve my chances of continued survival. This is a costly procedure that will require further hospitalization, more drugs and more treatment.

6. According to my doctor, I cannot survive without continued treatment. Moreover, my doctor has warned me that stress is detrimental to my health and may render our efforts at treatment ineffective.

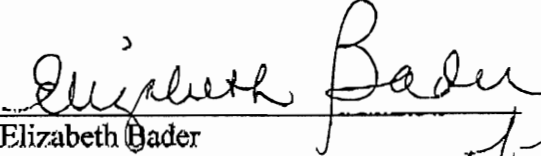
7. However, the practical financial effects of losing my salary increase, and the threat of being furloughed without pay for an—as yet—undetermined number of days can only mean financial devastation for me: it is impossible not to suffer from stress if one is paying attention at all.

8. I was counting on the raise to make the difference between what I presently earn and my increased living expenses. I am a clerk 2, salary grade 9 and losing 20% of my pay for any week means that I will not have enough money for basic necessities such as food, rent and utilities.

9. The governor promised us a raise, but he is now reneging on that promise. He promised us the rate of pay in our contract and the ability to utilize benefit time when we are not working, but now he has forced us to be furloughed without pay. This reduces my salary below the one the State has agreed to give me at my pay grade with my years of service, breaking another promise.

10. Given these broken promises, it is impossible not to be stressed and worried about the future. Since the governor has broken these promises, there is no reason to believe that he will keep his promise about no layoffs. Hence my stress level—and the impact on my well-being—grows, despite my doctor's warnings.

11. I believe that the Governor should be enjoined from violating our contract in any way or even threatening to violate our contract. I am being irreparably harmed by these threats and the harm to me is more than financial, as it impairs my continued ability to survive the cancer that I am fighting.


Elizabeth Bader 5/5/10

Sworn to before me this
5TH day of MAY, 2010.


NOTARY PUBLIC - STATE OF NEW YORK

PL/10-0645/IC/crb/Affidavit #

MARY A. ALLOCCA
Notary Public, State of New York
No. 4652505
Qualified in Suffolk County
Commission Expires Nov. 30, 2013